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January 7, 2025

Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

VIA ECF

Re: United States v. Avraham Eisenberg
23 Cr. 10 (AS) & 24 Cr. 251 (AS)

Dear Judge Subramanian:

Defendant Avraham Eisenberg's ("Eisenberg") sentencing hearing is scheduled for February 11, 2025 and his sentencing submission is due by January 28, 2025. The defense received the initial disclosure of the Presentence Investigation Report ("PSR") just before the holidays on December 17, 2024. Since then, the defense has been preparing its objections to the PSR and hoped to provide the objections to Probation by yesterday. However, the factual record of the case and the complexity of some of the sentencing issues have rendered the objection process lengthy. For this reason, Eisenberg requires an additional two weeks, to January 21, 2025, to file his objections and respectfully requests an extension to that date. We have been in contact with Probation and understand that they will require approximately 30 days to respond to the parties' objections and to file the final PSR. For this reason, Eisenberg also respectfully requests that final PSR disclosure date be extended to February 8, 2024. Based on this filing schedule, Eisenberg respectfully requests that the sentencing hearing be adjourned to any time on April 9 or 11 of 2025 or after 2:00 pm on April 10, 2025 or to another date in that time frame convenient to the Court. The government, by Assistant United States Attorney Thomas Burnett, does not oppose these applications.

Thank you for Your Honor's consideration of these requests.

Very truly yours,
Sanford Talkin
Sanford Talkin

cc: AUSA Thomas Burnett (by ECF)
AUSA Peter Davis (by ECF)
SAUSA Tian Huang (by ECF)